

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.



Order Filed on July 24, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**JOINT STIPULATION AND AGREED ORDER REGARDING
THE ADMISSION OF EXHIBITS AND DEPOSITION
DESIGNATIONS IN CONNECTION WITH MOTION TO DISMISS HEARING**

The relief set forth on the following pages is hereby **ORDERED**.

DATED: July 24, 2023


Honorable Michael B. Kaplan
United States Bankruptcy Judge

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

This stipulation and agreed order (this “Stipulation”) is made on this 19th day of July, 2023 (the “Stipulation Date”) by and among (1) the above-captioned debtor (“LTL” or “Debtor”); (2) Johnson & Johnson; (3) the Ad Hoc Committee of Supporting Counsel; (4) the Official Committee of Talc Claimants (“TCC”); (5) the Ad Hoc Group of Mesothelioma Claimants; (6) Paul Crouch; (7) the Ad Hoc Committee of States Holding Consumer Protection Claims; (8) law firms on behalf of various mesothelioma claimants; (9) Maune Raichle Hartley French & Mudd, LLC; (10) the Office of the United States Trustee for the District of New Jersey (“U.S. Trustee”); (11) Arnold & Itkin LLP; (12) certain claimants represented by The Barnes Law Group; and (13) the States of New Mexico and Mississippi regarding the admission of exhibits and deposition designations in connection with the hearing on the Motions to Dismiss (defined herein). The parties listed after the numerals 4 through 13 in the preceding sentence are referred to as the “Movants” in this Stipulation.

Recitals

WHEREAS, on April 4, 2023, the Debtor commenced the above captioned reorganization case (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code;

WHEREAS, motions to dismiss this Chapter 11 Case were filed by: (1) the TCC [Dkt. 286]; (2) the Ad Hoc Group of Mesothelioma Claimants [Dkt. 335]; (3) Paul Crouch [Dkt. 346]; (4) the Ad Hoc Committee of States Holding Consumer Protection Claims [Dkt. 350]; (5) law firms on behalf of various mesothelioma claimants [Dkt. 352]; (6) Maune Raichle Hartley French & Mudd, LLC Plaintiffs [Dkt. 358]; (7) the U.S. Trustee [Dkt. 379]; (8) Arnold & Itkin LLP [Dkt. 384]; (9) certain claimants represented by The Barnes Law Group [Dkt. 473]; and (10) the States of New Mexico and Mississippi [Dkt. 480] (together, the “Motions to Dismiss”);

WHEREAS, a hearing on the Motions to Dismiss started on June 27, 2023 and ended on June 30, 2023 (the “2023 MTD Hearing”);

WHEREAS, the parties to this Stipulation desired to avoid offering testimony at the 2023 MTD Hearing solely for the purpose of authenticating documents and desired to streamline the presentation of evidence at the 2023 MTD Hearing in the interests of judicial economy and efficiency;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED THAT THE EVIDENCE IDENTIFIED BELOW SHALL BE ADMITTED IN CONNECTION WITH THE 2023 MTD HEARING AS INDICATED BELOW:

1. Pursuant to Paragraph 1 of the *Evidentiary Stipulation for Hearing on the Motions to Dismiss Debtor’s Bankruptcy Case* (“Evidentiary Stipulation”) [Dkt. 852], the Court admits into evidence the exhibits and deposition testimony admitted into evidence in connection with the April 18, 2023 hearing on the *Debtor’s Motion Seeking an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction Filed by LTL Management LLC* (“2023 Preliminary Injunction Hearing”) [Dkt. 2, Adv. Pro. No. 23-01092]²;

² The Debtor submitted the following: (1) Debtor’s Exhibit List [Dkt. 66, Adv. Pro. No. 23-01092-MBK] and (2) Debtor’s Amended Deposition Designations [Dkt. 70, Adv. Pro. No. 23-01092-MBK]. The TCC submitted the following: Official Committee of Talc Claimants’ Notice of Submission of Evidence [Dkt. 71, Adv. Pro. No. 23-01092-MBK]. The Court admitted all evidence and designations in these submissions on April 20, 2023. See Apr. 20 Hr’g Tr. at Page 4, Line 13 – Page 5, Line 16 [Dkt. 263].

2. Pursuant to Paragraph 2 of the Evidentiary Stipulation, the Court admits into evidence the transcripts of witness testimony elicited during the 2023 Preliminary Injunction Hearing [Dkt. 262];

3. Pursuant to Paragraph 3 of the Evidentiary Stipulation, the Court admits into evidence the exhibits that were admitted into evidence pursuant to the *Joint Stipulation and Agreed Order Between Movants and Debtor Regarding the Admission of Exhibits at Motion to Dismiss Trial* [Dkt. 1497, Case No. 21-30589] for the February 14-18, 2022 hearing on the motions to dismiss filed by the Official Committee of Talc Claimants [Dkt. 632, Case No. 21-30589] and the law firm of Arnold & Itkin, LLP, on behalf of certain talc personal injury claimants [Dkt. 766, Case No. 21-30589] and the related Preliminary Injunction Motion in the Adversary Proceeding [Dkt. 2, Adv. Pro. No. 21-03032] in LTL's prior bankruptcy proceedings (Case No. 21-30589 (MBK)) (the "2022 Motion to Dismiss and Preliminary Injunction Hearing");

4. Pursuant to Paragraph 4 of the Evidentiary Stipulation, the Court admits into evidence the transcripts of witness testimony elicited during the 2022 Motion to Dismiss and Preliminary Injunction Hearing.

5. All of Debtor's exhibits listed below are admitted into evidence:

Ex.	Description	Beg. Bates No.	Confidential Designation
D-1	John Kim Direct Testimony Declaration and Exhibits		
D-2	Richard Dickinson Direct Testimony Declaration and Exhibits		
D-3	Robert Wuesthoff Direct Testimony Declaration and Exhibits		
D-4	Adam Lisman Direct Testimony Declaration and Exhibits		
D-5	Jim Murdica Direct Testimony Declaration and Exhibits		
D-6	Mikal Watts Direct Testimony Declaration and Exhibits		

Ex.	Description	Beg. Bates No.	Confidential Designation
D-7	James Onder Direct Testimony Declaration and Exhibits		
D-64	Expert Report of Charles H Mullin, PhD – June 7, 2023		
D-65	Rebuttal Expert Report of Charles H. Mullin, PhD – June 14, 2023		
D-66	Expert Report of Gregory K. Bell, Ph.D. – June 7, 2023		
D-67	Supplemental Expert Report of Gregory K. Bell, Ph.D. – June 20, 2023		
D-68	Expert Report of Sheila L. Birnbaum – June 14, 2023		
D-70	Mullin Reliance Materials - “Talc Trial Costs” excel file located at 01 Data Professional Eyes Only / Defense / Talc Trial Costs / Source	LTLMGMT-00015251	Confidential
D-80	Mullin Reliance Materials	LTLMGMT-00015613	Confidential
D-81	Mullin Reliance Materials	LTLMGMT-00015648	Confidential
D-82	Mullin Reliance Materials	LTLMGMT-00015668	Confidential
D-83	Mullin Reliance Materials	LTLMGMT-00015682	Confidential
D-84	Mullin Reliance Materials	LTLMGMT-00015718	Confidential
D-85	Mullin Reliance Materials	LTLMGMT-00015729	Confidential
D-86	Mullin Reliance Materials	LTLMGMT-00015745	Confidential
D-87	Mullin Reliance Materials	LTLMGMT-00015848	Confidential
D-88	Mullin Reliance Materials	LTLMGMT-00015859	Confidential
D-89	Mullin Reliance Materials	LTLMGMT-00015880	Confidential
D-90	Mullin Reliance Materials	LTLMGMT-00015917	Confidential
D-91	Mullin Reliance Materials	LTLMGMT-00015952	Confidential
D-92	Mullin Reliance Materials	LTLMGMT-00015974	Confidential
D-93	Mullin Reliance Materials	LTLMGMT-00016011	Confidential
D-94	Mullin Reliance Materials	LTLMGMT-00016036	Confidential
D-95	Mullin Reliance Materials	LTLMGMT-00016058	Confidential

Ex.	Description	Beg. Bates No.	Confidential Designation
D-96	Mullin Reliance Materials	LTLMGMT-00016080	Confidential
D-97	Mullin Reliance Materials	LTLMGMT-00016101	Confidential
D-98	Mullin Reliance Materials	LTLMGMT-00016124	Confidential
D-99	Mullin Reliance Materials	LTLMGMT-00016150	Confidential
D-100	Mullin Reliance Materials	LTLMGMT-00016184	Confidential
D-101	Mullin Reliance Materials	LTLMGMT-00016251	Confidential
D-102	Mullin Reliance Materials	LTLMGMT-00016271	Confidential
D-103	Mullin Reliance Materials	LTLMGMT-00016291	Confidential
D-104	Mullin Reliance Materials	LTLMGMT-00016313	Confidential
D-170	Article entitled, “What Cancer Victim Would Agree to That?": Opposition Brewing Over Talc Powder Deal” dated April 6, 2023		
D-175	Article entitled, “J&J Disguises Second Bankruptcy As Sham Settlement” dated April 5, 2023		
D-176	Article entitled, “Beasley Allen/Ashcraft & Gerel Law Firs: Talc MDL Leadership Rejects Johnson & Johnson’s Second Attempt to Abuse Bankruptcy Process” dated April 6, 2023		
D-177	Article entitled, “Cancer Victims’ Lawyers Vow to Fight J&J Proposed Settlement” dated April 6, 2023		
D-183	Term Sheet with Exhibit A	LTLMGMT-00002628	Confidential ³
D-184	310Ba - Worldwide Dividend Policy.docx	LTLMGMT-00013209	
D-198	Group Holdings Ownership Structure (2022)	LTLMGMT-00013206	
D-199	J&J HoldCo (NA) Org Chart (February 2022)	LTLMGMT-00013207	
D-219	JIFC to GTSC Loans.docx	LTLMGMT-00005601- LTLMGMT-00005601	

³ The admission of confidential documents does not abrogate the protections afforded under the *Order Governing Confidential Information By and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(B)* (“**Protective Order**”) [Dkt. 545].

Ex.	Description	Beg. Bates No.	Confidential Designation
D-385	Royalty A&M five-year cashflow projection	LTL-0029874	
D-386	Holdco Organizational Chart	LTLMGMT-00013207	
D-387	Holdco legal entities and valuations	LTLMGMT-00014004	
D-388	JJFC loans to Global Treasury Services Center ("GTSC")	LTLMGMT-00013257	
D-389	KPMG summary of GH Biotech legal entities fair market value	LTLMGMT-00014005	
D-390	Holdco dividends	LTLMGMT-00013463	
D-392	J&J and Holdco Facility Agreement*	LTLMGMT-00017069	
D-393	7 - LTL0030450_LTL0030207-LTL0031327 (JJCI Valuation).pdf	LTLMGMT-00011288-LTLMGMT-00011292	
D-395	JJ HoldCo NA Chart (prelim valuations) (1).xlsx	LTLMGMT-00011339-LTLMGMT-00011339	
D-405	JJFC_ETC - 2022 Amended and Restated Facility.pdf	LTLMGMT-00011582-LTLMGMT-00011591	
D-478	Ad Hoc Committee of States' Responses and Objections to the Debtor's First Set of Interrogatories and Executed Verification		
D-480	Beasley Allen's Responses and Objections to the Debtor's First Set of Interrogatories		
D-481	TCC's Verified Responses and Objections to the Debtor's First Set of Interrogatories		
D-483	TCC's Verified Supplemental Responses to Debtor's Interrogatory Nos. 6 & 8		
D-484	Second Supplemental Responses and Objections to Interrogatory Nos. 2, 4, and 10 in the Debtor's First Set of Interrogatories to the Official Committee of Talc Claimants, dated June 23, 2023		
D-486	First Supplemental Verified Statement of Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019 (Dkt. 807, 23-12825-MBK)		
D-487	<i>Bestwall</i> (No. 17-31795-LTB, Bankr. W.D.N.C.), January 19, 2022 Hearing Transcript		
D-488	<i>Bestwall</i> (No. 17-31795-LTB, Bankr. W.D.N.C.), March 3, 2023 Hearing Transcript		

Ex.	Description	Beg. Bates No.	Confidential Designation
D-489	<i>Bestwall</i> (No. 17-31795-LTB, Bankr. W.D.N.C.), April 6, 2022 Hearing Transcript		
D-490	<i>Bestwall</i> (No. 17-31795-LTB, Bankr. W.D.N.C.), September 19, 2019 Hearing Transcript		
D-491	<i>Bestwall</i> (No. 17-31795-LTB, Bankr. W.D.N.C.), September 24, 2020 Hearing Transcript		
D-493	2021-01-28 – Imerys 9 th Amended Plan and TDPs		
D-517	Compass Lexecon memo to Brown Rudnick re: “Duplication of Records in PSA Claimant and Ad Hoc Committee Lists,” dated June 23, 2023		
D-518	Apsis – J&J HoldCo – JNJ – Letter of direction in respect of intercompany funding flows	LTLMGMT-00017082	
D-520	Apsis – Minutes of the sole shareholder’s decision (approval FY 2022) – CMS review 21062023	LTLMGMT-00017090	
D-529	Sixth Monthly Fee Statement of Houlihan Lokey Capital, Inc. (Dkt. 2628, No. 21-30589-MBK)		
D-538	Tenth Monthly Fee Statement of Houlihan Lokey Capital, Inc. (Dkt. 3262, No. 21-30589-MBK)		
D-543	Fee Application Cover Sheet the Period June 1, 2022 through September 30, 2022 for the Brattle Group, Inc. (Dkt. 3387, No. 21-30589-MBK)		
D-544	Third Interim Fee Application of FTI Consulting, Inc. (Dkt. 3390, No. 21-30589-MBK)		
D-552	LTL II – Summary Exhibit re Claims Estimation		
D-553	TCC’s Exclusivity Slides from June 13, 2023 Hr’g		
D-554	Barnes Law Group’s Second Supplemental Response to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case (or Adversary Proceeding), dated June 22, 2023		
D-555	Weitz & Luxenberg, PC’s Response and Objections to Request for Production No. 1 in the Debtor’s Request for Production, dated June 22, 2023		
D-556	Levy Konigsberg Letter to Mark Rasmussen, Esq. re Response to Interrogatory No. 1, dated June 21, 2023		
D-557	Dean Omar’s Supplemental Response to Debtor’s First Set of Interrogatories to Dean Omar Branham Shirley, LLP and Dean Omar Branham Shirley, LLP Acting for Dean Omar Talc Claimants, dated June 23, 2023		

Ex.	Description	Beg. Bates No.	Confidential Designation
D-558	Arnold & Itkin's Supplemental Response to Interrogatory No. 1, dated June 23, 2023		
D-559	MRHFM Verified 2019.1 Disclosure		
D-560	2023-05-22 Ruckdeschel letter to Wall regarding discovery		
D-561	Amended Chapter 11 Plan (Dkt. 912, 23-12825-MBK)		
D-562	Redlines of Amended Plan and Exhibits in Support of Amended Chapter 11 Plan (Dkt. 913, 23-12825-MBK)		
D-563	Verified Statement of Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019 (Dkt. 470, 23-12825-MBK)		
D-564	In re: Third Party Payor Talc Litigation Lien and/or Subrogation Interests Confidential Settlement Agreement Term Sheet, dated June 20, 2023		Confidential
D-565	July 10, 2023 Trial Transcript, Valadez v. Johnson & Johnson, et al., No. 22-cv-012759 (Cal. Super., Alameda County)		
D-566	July 18, 2023 Jury Verdict Transcript, Valadez v. Johnson & Johnson, et al., No. 22-cv-012759 (Cal. Super., Alameda County)		
D-567	July 18, 2023 Jury Verdict Form, Valadez v. Johnson & Johnson, et al., No. 22-cv-012759 (Cal. Super., Alameda County)		

6. All of Movants' exhibits listed below are admitted into evidence:

Ex.	Description	Beg. Bates No.	Confidential Designation
2	Form 10-Q for the period ending 10.3.2021		
9	Approval Request for Restructuring of JJCI – Memo of Approval – Oct. 11, 2021	LTL 0021791	Confidential
10	Email re: Final Materials for Today – May 19, 2020	JNJTALC 001436896	Confidential
23	Minutes of Board of Managers - October 14, 2021	LTL 0019184	Confidential
26	J&J Press Release Re: Johnson & Johnson Announces Plans to Accelerate Innovation, Serve Patients and Consumers, and Unlock Value through Intent to Separate Consumer Health Business		Confidential
68	JJCI Valuation	LTL 0030450	Confidential
110	Email re: Litigation follow-up – July 19, 2021	LTL 0030195	Confidential
161	Debtor's Supplemental Response to Official Committee of Talc Claimants' RPD No. 40		Confidential

Ex.	Description	Beg. Bates No.	Confidential Designation
259	Verdict Form, Teresa Leavitt v. Johnson & Johnson et al, California Superior Court, Alameda Co., Case No. RG17882401; March 13, 2019.		
263	Jury Verdict Sheets - Amended, Douglas and Roslyn Barden, et al v. Johnson & Johnson et al., New Jersey Superior Court, Middlesex County, Docket No.: MID-L-1809-17 AS; September 11, 2019.		
300	Email re: Project Plato – Oct. 7, 2021		Partially redacted
342	Debtor's Objection to MTD Chapter 11 Case - Case No. 21-30589-MBK (Doc 956)		
511	Email from Michelle Ryan to Michael Levesque re: Litigation follow-up – July 19, 2021	LTL 0030195	Confidential
514	Declaration of John Kim in Support of First Day Pleadings, US Bankruptcy Court W District of North Carolina, 10/14/21, Case 21-30589 Doc #5		
559	First Day Dec. of Alexandra Picard, In re Imerys Talc America, Inc., et al. (Bankr. Del. 19-10289), Doc. No. 10		
750	LTL's Monthly Operating Report for Reporting Period Ended 02/28/2023 (Case No. 21-30589 (Dkt 3886))		
751	Term Sheet (Exhibit B to PSA)	LTLMGMT-00002628	Highly Confidential
752	Minutes of LTL Board of Managers – Mar. 16, 2023	LTLMGMT-00002626	Confidential
755	Master Creditors List - Case No. 21-30589 (Dkt 4);		
756	Schedules of Assets and Liabilities for LTL Management LLC - Case No. 23-12825 (Dkt 450)		
758	Pulaski Kherkher Article: Were You Diagnosed With Ovarian Cancer, Fallopian Cancer, or Peritoneal Cancer After Regular Baby Powder Use?		
759	Plan Support Agreement signed by Adam Pulaski	LTLMGMT-00001156	Highly Confidential
760	Chapter 11 Plan of Reorganization of LTL Management LLC - Case No. 23-12825 (Dkt 525)		
763	Onder Law Article: \$8.9B J&J Talc Resolution: Questions and Answers		
765	Email from James Onder to Allen Smith re: Onder Law Referral Network Update – May 19, 2023		
766	Watts LTL/J&J Deposition Prep Notes		
768	Transcript of Oral Argument Before Third Circuit (10.4.2022) Case No. 22-2003 Dkt. 148		
769	In re LTL - Third Circuit Opinion (highlighted version)		
780	S&P Credit Agency Meeting - Johnson & Johnson	SP-LTL-0000141	
781	Emails Between S&P and J&J re: S&P Global Ratings Draft Bulletin for Review – April 5, 2023	SP-LTL-0000323	Confidential

Ex.	Description	Beg. Bates No.	Confidential Designation
782	Emails Between S&P and J&J re: A couple of questions – Apr. 26, 2023	SP-LTL-0000342	
783	Draft of S&P Global Rating Bulletin – Johnson & Johnson’s Proposed \$8.9B Settlement Plan Increases Debt Leverage; Credit Quality is Unaffected – Apr. 5, 2023	SP-LTL-0000337	Confidential
784	Refinitiv StreetEvents Edited Transcript - JNJ.N - Johnson & Johnson Earnings Call – April 18, 2023		
785	J&J Form 10-Q - April 28, 2023		
786	J&J News Release: Johnson & Johnson Subsidiary LTL Management LLC ("LTL") Re-Files for Voluntary Chapter 11 to Equitably Resolve All Current and Future Talc Claims – Apr. 4, 2023		
790	Statement on TCC Standing Motion to Dismiss		
791	LTL 2023 Voluntary Petition for Non-Individuals Filing for Bankruptcy 23-12825-MBK (Dkt 1)		
792	Amended and Restated Funding Agreement – October 12, 2021	LTL 0000001	
794	2023 Declaration of John K. Kim In Support of First Day Pleadings		
795	Plan Support Agreement Signed by James Onder	LTLMGMT-000002785	
800	Minutes of LTL Board of Managers – March 16, 2023	LTLMGMT-00002626	Confidential
801	Minutes of Board of Managers – March 28, 2023	LTLMGMT-00000001	Confidential
802	Presentation to Board of Managers of LTL Management – Mar. 28, 2023	LTLMGMT-00002641	Confidential
803	Presentation to Board of Managers of LTL Management LLC – March 28, 2023	LTLMGMT-00000233	PEO as to Slide 12
804	Minutes of Board of Managers – April 2, 2023	LTLMGMT-00000006	Confidential
805	Presentation to Board of Managers of LTL Management LLC – April 2, 2023	LTLMGMT-00002668	Confidential
806	KPMG Presentation - J&J - Fair Market Value of Certain Legal Entities of GH Biotech Holdings Limited	LTLMGMT-00000195	Confidential
807	Form 8-K dated Apr. 4, 2023		
809	Notice of Debtor's Motion for An Order Directing Plaintiff Law Firms to Disclose Third-Party Funding Arrangements – Case No. 21-30589 (Dkt 3551)		
811	Federal Appellate Court Rejects Controversial J&J Ploy to Dodge Talc Cancer Lawsuits		
812	Majed Nachawati and Michael Gorwitz - <i>Bankrupting the Civil Justice System</i> - ALM Law.com Article		
813	Plan Support Agreement (PSA) signed by Majed Nachawati	LTLMGMT-00003498	Confidential
814	Text Thread with Majed Nachawati (May 10)		

Ex.	Description	Beg. Bates No.	Confidential Designation
815	BeasleyAllen Article — J&J Disguises Second Bankruptcy As Sham Settlement		
816	Beasley Allen Law Firm Article - "Cancer Victims Uniting to Oppose Johnson & Johnson's Latest Bankruptcy Ploy"		
817	Beasley Allen/Arnold & Itkin Law Firms: On Eve of J&J Bankruptcy Dismissal, Cancer Victims Prepare to Enter Civil Court System		
818	ALM Law.com Article by Adolfo Pesquera - What Cancer Victim Would Agree to That? Opposition Brewing Over Talc Powder Deal		
819	Email from Beasley Allen to [Redacted] RE: Johnson & Johnson Second Talc Bankruptcy is Another Sham		Confidential
822	Plan Support Agreement (PSA) signed by Basil Adham	LTLMGMT-00000900	
828	Onder Law Article: Appeals Court Denies J&J Talc Bankruptcy Strategy		
830	Talcum Powder Ovarian Cancer Litigation – OnderLaw Criteria		
831	Onder Law Blog 8.9B J&J Talc Lawsuits Resolution Reached		
832	OnderLaw Blog Talc Q&A		
836	Notice of Debtor's Motion for An Order Authorizing It to Enter An Expense Reimbursement Agreement with AHC of Supporting Counsel – Case No. 23-12825 (575)		
838	TCC Notice of Deposition of Johnson & Johnson		Confidential
839	Johnson & Johnson HoldCo (NA) Inc.'s R&Os to the TCC's Notice of Deposition of Johnson & Johnson		Confidential
841	Johnson & Johnson GH Biotech Distribution 2022 - Bible of Documentation - France / Germany Steps	LTLMGMT-00013349	Confidential
843	Johnson & Johnson Holdco (NA) Inc. (US - 6101) ("Old JJCI") Structure Chart As of February 7, 2023 (PPT)		Confidential
844	Johnson & Johnson Worldwide Financial Procedures - 310Ba - Worldwide Dividend Policy	LTLMGMT-00013195	Confidential
845	Johnson & Johnson Worldwide Financial Procedures - 310Ga - Non-US Affiliate Approved Borrowing Limits	LTLMGMT-00013220	Confidential
847	Johnson & Johnson - Opinion of FMV - Equity Value Summary - Johnson & Johnson Urban Renewal Associates (LE 6093) - Excel Sheet		Confidential
848	Johnson & Johnson - Summary of Values - LE 7825 (Pharmaceutical business) - Excel Sheet		Confidential
849	Johnson & Johnson - Diligent Entities Export - Excel Sheet		Confidential
850	Johnson & Johnson - Summary - Excel Sheet		Confidential
851	Johnson & Johnson - Opinion of FMV - Summary of Values - Johnson & Johnson Financial Services GmbH (7905) - Excel Sheet		Confidential

Ex.	Description	Beg. Bates No.	Confidential Designation
852	Kenvue Inc. Form S-1		
853	Johnson & Johnson Treasury Services	LTL 0029924 / LTLMGMT- 00013299	
856	Richard (Rich) Dickinson LinkedIn		
857	Richard Dickinson Offer Letter to join Johnson & Johnson Services Inc. and be Seconded to LTL Management LLC as CFO		
858	LTL Monthly Operating Report - Reporting Period Ended 3.31.2023		
859	LTL Monthly Operating Report - Reporting Period Ended 10.31.2021		
860	LTL 2021 Voluntary Petition for Non-Individuals Filing for Bankruptcy 21-30589-MBK (Dkt 1)		
867	Email from David Kaplan to Shannon Murphy re: JNJ talc (dated 1.31.2023)	SP-LTL-0000330	Confidential
868	Email from Duane Van Arsdale to David Kaplan re: Scheduling our annual Meeting in	SP-LTL-0000678	Confidential
869	S&P Global – Management Meeting or Phone Notes	SP-LTL-0000690	Confidential
870	Email from David Kaplan to Shannon Murphy, Arthur Wong, and Patrick Bell re: JNJ proposed increase in talc settlement	SP-LTL-0000673	Confidential
871	S&P Global Ratings Bulletin: Johnson & Johnson's Proposed \$8.9B Legal Settlement Plan Increases Debt Leverage; Credit Quality if Unaffected	SP-LTL-0000325	Confidential
876	Expert Report of Saul E. Burian		
912	Informational Brief of LTL Management LLC - Case No. 21-30589 (Dkt 3)		
924	Johnson & Johnson Form 10-K- Annual Report for FY ending Jan, 1, 2023		
966	Expert Report of D. Theodore Rave		
967	Supplemental and/or Rebuttal Expert Report of D. Theodore Rave		
980	Expert Report of Hon. Royal Furgeson (Ret.)		
1012	OnderLaw Client Talc Litigation Bankruptcy Update		
1014	Brief for Andrew R. Vara, United States Trustee, as Amicus Curiae In Support of Appellant's and Supporting Reversal (6/30/2022)		
1016	J.P. Morgan – Johnson & Johnson: Quick Thoughts on Today's Talc Update (North American Equity Research)	JPM-0000001	
1022	OnderLaw Talc Litigation Update		
1056	Shareholder's Resolution of Johnson & Johnson Holding GmbH	LTLMGMT- 00017086	Confidential
1059	Opinion of Fair Market Value - Johnson & Jonson Medical GmbH (LE 7930) - Excel Sheet	LTLMGMT- 00013346	
1060	Opinion of Fair Market Value - Johnson & Johnson Medical SAS (LE 7840) - Excel Sheet	LTLMGMT- 00013344	

Ex.	Description	Beg. Bates No.	Confidential Designation
1061	Valuation - Janssen-Cilag - Pharmaceutical Business (LE 7825) - Excel Sheet	LTLMGMT-00013343	
1062	Opinion of Fair Market Value - Janssen-Cilag GmbH (LE 8000) - Excel Sheet	LTLMGMT-00013348	
1063	J&J Worldwide Financial Procedures 310Ha - Borrowing Policy	LTL0029914 / LTLMGMT-00013289	Confidential
1073	Direct Declaration of John K. Kim		
1081	Exhibit D to John Kim Declaration - Termination & Substitution Agreement		
1082	Exhibit E to John Kim Declaration - 2023 Funding Agreement		
1083	Exhibit F to John Kim Declaration - J&J Support Agreement		
1087	Minutes of Board of Managers – February 23, 2023	LTLMGMT-00013464	Confidential
1112	Rebuttal Expert Report of Saul Burian		
1124	Products Liability and Mass Torts - Dechert LLP		
1125	Health Care - Dechert LLP		
1126	Crisis Management Practice Group Page - Dechert LLP		
1127	Debtor's Motion For an Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtor in the Ordinary Course of Business		
1150	Bloomberg - J&J Begins 'Audacious' Return to Failed Cancer Settlement Tactic – April 5, 2023		

7. The Court admits into evidence or takes judicial notice of the following docket entries, in accordance with the *Joint Stipulation Regarding the Admission of Certain Evidence at Trial* [Dkt. 955] by and between Arnold & Itkin LLP, on behalf of certain talc personal injury claimants represented by Arnold & Itkin, and the Debtor (the “A&I Joint Stipulation”):

Dkt.	Description	Date	Confidential Designation
384-2	Exhibits A-D to Declaration of Laura Davis Jones in Support of Motion to Dismiss Bankruptcy Case (subject to terms of A&I Joint Stipulation)	May 1, 2023	
856	Exhibits 1-6 to Declaration of Laura Davis Jones in Support of Reply in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants, to Dismiss Chapter 11 Case (subject to terms of A&I Joint Stipulation)	June 22, 2023	

8. Pursuant to Paragraph 8 of the Evidentiary Stipulation, the Court admits into evidence the deposition designations and counter-designations jointly submitted to the Court on June 26, 2023. This Stipulation shall constitute the entire agreement and understanding between Movants and Debtor relating to the subject matter hereof and supersedes all prior agreements and understandings between Movants and Debtor relating to the subject matter hereof.

9. The Court shall retain jurisdiction to resolve any disputes, controversies, or ambiguities arising from this Stipulation.

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